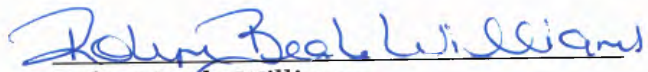


4. I met with the defendants to begin gathering information responsive to the complaint and motion. However, potential witnesses with information pertinent to the issues in this case were on break due to the holidays.

5. On December 18, 2015 I contacted Plaintiff's counsel to obtain an extension of time to respond to the Complaint and Motion. Plaintiff's counsel agreed to extend the deadline to respond to the pleadings until December 31, 2015. Prior to filing a motion with the Court, an order issued.

6. Due to internet issues, I was unable to finalize and file the responsive pleading until I returned to my office January 4, 2016.

Further affiant sayeth not.


Robyn Beale Williams

STATE OF TENNESSEE)
COUNTY OF DAVIDSON)

Subscribed and sworn to before me this 5th day of January, 2016.


Notary Public

My commission expires: _____



Respectfully submitted,

/s/Robyn Beale Williams

Robyn Beale Williams, BPR #19736

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capacity as Director of Schools for Giles
County, Tennessee, and Micah Landers, in his
individual and official capacity as Principal of
Richland High School*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 5th day of January 2016, a true and correct copy of the foregoing has been forwarded via the U.S. District Court's electronic notification system to:

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/s/ Robyn Beale Williams

Robyn Beale Williams